

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

IN RE:	Chapter 11
BDC Group Inc.,	Bankruptcy No. 23-00484
Debtor-in-Possession.	MOTION TO ASSUME AND REJECT UNEXPIRED LEASES

COMES NOW the Debtor-in-Possession, BDC Group Inc., through its undersigned counsel, and hereby respectfully requests this Court authorize it to assume and reject leases it has with Manchester Leasing Services, Inc., stating the following in support:

1. Debtor and Manchester Leasing Services, Inc. ("MLS") are parties to nine Master Lease Agreements/Equipment Lease Agreements. These agreements are further described in MLS's Motion for Order Directing Debtor to Assume or Reject Executory Contracts Pursuant to 11 U.S.C. § 365 (Doc. 146).
2. MLS has filed proofs of claim in Debtor's bankruptcy for these leases.
3. After careful review and deliberation, Debtor has determined in its business judgment that three of its MLS leases are not necessary for the continued operation of the Debtor's business and that rejection of the leases will benefit estate, while its remaining six MLS leases are necessary and that assumption of the leases will benefit the estate. The table below outlines Debtor's wishes for MLS's leases:

Contract #	POC #	Leased Vehicle/Equipment	Assume/Reject
1354	35	2019 Dodge Ram 3500 Tradesman (VIN3C63R3GL6KG553021)	Assume
1377	36	2019 Dodge Ram 3500 Tradesman (VIN3C63R3GL6KG51578)	Assume
1414	37	2019 Dodge Ram 3500 Tradesman (VIN3C63R3CL1KG658913)	Assume
1459	38	2018 DitchWitch JT25 (Serial #DWPJT25XLJ0000707) and attachments	Reject
1461	40	2018 DitchWitch JT10 (Serial #DWPJT10XKJ0000507) and attachments	Assume
1462	41	2018 Ditch Witch RT125Q (Serial #DWPRT125QCJ0000190) and attachments	Reject

Contract #	POC #	Leased Vehicle/Equipment	Assume/Reject
1463	42	2018 Ditch Witch RT125Q (Serial #DWPRT125QPJ0000189) and attachments	Reject
1464	43	2019 Ditch Witch HX30 (Serial #DWPHX30XCK0000302)	Assume
1465	44	2019 Ditch Witch HX30 (Serial# DWPHX30XAK0000402)	Assume

4. BDC is accepting MLS' proposal to address the June and July payment defaults on the assumed leases by extending the assumed leases' terms by two months and continuing the regular lease payments through those times.
5. Since Debtor no longer needs the equipment leased in contracts #1459, #1462, and #1463, Debtor wishes to reject the leases, to any extent the lease is binding on Debtor.
6. Since Debtor's business will still require the vehicles and equipment leased in contracts #1354, #1377, #1414, #1461, #1464, and #1465, Debtor wishes to assume these leases.

WHEREFORE the Debtor-in-Possession respectfully requests this Court authorize it to assume and reject leases it has with Manchester Leasing Services, Inc., as described above, and grant such other relief as is just and equitable given the circumstances.

Dated this 15th day of September, 2023.

Respectfully submitted,

AG & BUSINESS LEGAL STRATEGIES

/s/ Austin Peiffer

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ATTORNEY FOR DEBTOR-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of September, 2023, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF system.

Signed: /s/ Leah M. Watson